JENNER & BLOCK LLP

Vincent E. Lazar 353 North Clark Street Chicago, IL 60654-3456

Telephone: (312) 923-2989 Email: vlazar@jenner.com

Counsel for Defendant

v.

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

In re:

Sears Holdings Corporation, et al.,

Debtors. (Jointly Administered)

Sears, Roebuck and Co., Kmart Holding Corporation, California Builder Appliances, Inc., Florida Builder Appliances, Inc. and StarWest, LLC,

Plaintiffs,

Electrolux Home Products, Inc.dba Electrolux

Major Appliances,

Defendant.

Adv. No. 20-06589

Chapter 11

STIPULATED ORDER EXTENDING DEADLINES UNDER ORDERS ESTABLISHING STREAMLINED PROCEDURES GOVERNING ADVERSARY PROCEEDINGS BROUGHT BY THE DEBTORS PURSUANT TO SECTIONS 502, 547, 548 AND 550 OF THE BANKRUPTCY CODE

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are as follows: Sears Holdings Corporation (0798); Kmart Holding Corporation (3116); Kmart Operations LLC (6546); Sears Operations LLC (4331); Sears, Roebuck and Co. (0680); ServiceLive Inc. (6774); SHC Licensed Business LLC (3718); A&E Factory Service, LLC (6695); A&E Home Delivery, LLC (0205); A&E Lawn & Garden, LLC (5028); A&E Signature Service, LLC (0204); FBA Holdings Inc. (6537); Innovel Solutions, Inc. (7180); Kmart Corporation (9500); MaxServ, Inc. (7626); Private Brands, Ltd. (4022); Sears Development Co. (6028); Sears Holdings Management Corporation (2148); Sears Home & Business Franchises, Inc. (6742); Sears Home Improvement Products, Inc. (8591); Sears Insurance Services, L.L.C. (7182); Sears Procurement Services, Inc. (2859); Sears Protection Company (1250); Sears Protection Company (PR) Inc. (4861); Sears Roebuck Acceptance Corp. (0535); Sears, Roebuck de Puerto Rico, Inc. (3626); SYW Relay LLC (1870); Wally Labs LLC (None); SHC Promotions LLC (9626); Big Beaver of Florida Development, LLC (None); California Builder Appliances, Inc. (6327); Florida Builder Appliances, Inc. (9133); KBL Holding Inc. (1295); KLC, Inc. (0839); Kmart of Michigan, Inc. (1696); Kmart of Washington LLC (8898); Kmart Stores of Illinois LLC (8897); Kmart Stores of Texas LLC (8915); MyGofer LLC (5531); Sears Brands Business Unit Corporation (4658); Sears Holdings Publishing Company, LLC. (5554); Sears Protection Company (Florida), L.L.C. (4239); SHC Desert Springs, LLC (None); SOE, Inc. (9616); StarWest, LLC (5379); STI Merchandising, Inc. (0188); Troy Coolidge No. 13, LLC (None); BlueLight.com, Inc. (7034); Sears Brands, L.L.C. (4664); Sears Buying Services, Inc. (6533); Kmart.com LLC (9022); Sears Brands Management Corporation (5365); and SRe Holding Corporation (4816). The location of the Debtors' corporate headquarters is 3333 Beverly Road, Hoffman Estates, Illinois 60179.

Sears, Roebuck and Co., Kmart Holding Corporation, California Builder Appliances, Inc., Florida Builder Appliances, Inc., and StarWest, LLC. (the "Plaintiffs" or "Debtors"), each a debtor in the above-captioned chapter 11 case, and Electrolux Home Products, Inc. dba Electrolux Major Appliances (the "Defendant" and, together with Plaintiffs, the "Parties") through their respective counsel, enter into this Stipulation Extending Deadlines Under Orders Establishing Streamlined Procedures Governing Adversary Proceedings Brought By The Debtors Pursuant To Sections 502, 547, 548 And 550 Of The Bankruptcy Code.

- 1. On October 9, 2020 Plaintiffs filed their Complaint To Avoid And Recover Transfers

 Pursuant To 11 U.S.C. §§547, 548, And 550 And To Disallow Claims Pursuant To 11 U.S.C. §

 502.
- 2. On November 2, 2020, Plaintiffs filed a Motion For Orders Establishing Streamlined Procedures Governing Adversary Proceedings Brought By The Debtors Pursuant To Sections 502, 547, 548 And 550 Of The Bankruptcy Code (the "Motion").
- 3. On December 2, 2020, the *Order On Motion For An Order Establishing Streamlined Procedures Governing Adversary Proceedings With Total In Controversy Greater Than \$500,000 Brought By The Debtors Pursuant To Sections 502, 547, 548 And 550 Of The Bankruptcy Code (the "Procedures Order") related to Plaintiffs' Motion was entered.*
- 4. On December 4, 2020, the Court entered a *Stipulated Order for Inclusion on Orders Establishing Streamlined Procedures Governing Adversary Proceedings Brought By The Debtors Pursuant To Sections 502, 547, 548, and 550 of the Bankruptcy Code* [Adv. Dkt. 5] under which the Parties agreed to adhere to the deadlines set forth in the Procedures Order.
- 5. The Parties hereby agree that the applicability of the Procedures Order and all deadlines set forth therein shall be stayed indefinitely to enable the Parties to engage in settlement

discussions.

6. If the Parties are unable to reach a settlement, the Parties shall file a separate stipulation setting forth mutually agreeable deadlines in lieu of those contained in the Procedures Order.

AGREED TO BY	
ASK LLP	JENNER & BLOCK LLP
/s/ Gary D. Underdahl Gary D. Underdahl, Esq. 2600 Eagan Woods Drive, Suite 400 St. Paul, MN 55121 Telephone: (651) 289-3857 Fax: (651) 406-9676 Email: gunderdahl@askllp.com	Vincent E. Lazar Vincent E. Lazar 353 North Clark Street Chicago, IL 60654-3456 Telephone: (312) 923-2989 Email: vlazar@jenner.com Counsel for Defendant
Counsel for Plaintiffs	V
SO ORDERED	
Dated: White Plains, New York	
	THE HONORABLE ROBERT D. DRAIN